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ABSTRACT

In 1981 four supervisors at a chemical company in Great Britain were each fined 100 pounds under the country's 1974 Health and Safety at Work Act after a fifth supervisor was injured because of a faulty interlock guard. The supervisors were convicted because they had all known about but had done nothing to rectify the potential safety hazard. The incident underscores supervisors' legally mandated responsibilities for maintaining a safe system at work. When safety at work is viewed in terms of a unitary system it becomes clear that all managers, especially those having direct contact with employees, have safety responsibilities. Recent health and safety legislation in Britain seems to underline the need to give a wider meaning to the concept of a safe system at work. Besides being expected to ensure that all functional elements at their work site are safe, employers are expected to guarentee safe development of the work process in all stages and an efficient system of safety controls. The total safety system should consist of the following five stages: design and planning, construction, work operation, a monitoring system, and procedures for dealing with an emergency. The issue of the individual supervisor's legal responsibility for creating and maintaining a safe system of work is partly dependent on what the law affirms and partly upon the supervisor's contract of employment. Depending on the type of contract involved, there are two sections of the 1974 safety act that may divert some or all of the responsibility for safety from employers to their supervisors. The law also provides some protection for supervisors, but their getting justice depends on their vigilance and understanding of their rights and responsibilities. (MN)

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SAFETY AND THE SUPERVISOR

A safe system of work

by Tony Corfield

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TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)."

Tony Corfield makes the case for treating occupational safety as a unitary system. The "laundry list" conception of management's duty of care put together over the years by the judges in civil law cases, he argues, is out of date. It no longer corresponds to the facts of industry today, nor to the needs of safety management.

Management must view safety at work as a whole, as one interconnected system.

Some of the implications for supervisors, placed as they are in a key interface in this system, are brought out in this paper. Their status and training need careful reconsideration.

A Legal Ruling

In 1981, four supervisors from an Avonmouth Chemicals company were fined £100 each under the 1974 Health and Safety at Work Act. None of them was directly involved in the accident which led to their prosecution. A fifth supervisor injured himself on a shift when none of the other four was present. But the basic cause of the accident was the omission to report and get corrected a failure in an interlock guard. The failure had been left unrectified for a period of some two months and all the supervisors had been aware of it. The four supervisors were sentenced for not taking action to remove a potential hazard within their own sphere of authority. Their employer was not prosecuted.(1)

The exclusion of the employer from prosecution in this case aroused controversy. ASTMS, the supervisors' trade union, protested to the HSE's Area Director. They argued that the employer had a poor safety record. They questioned the assumption that the higher levels of management were not just as aware of the defective guard as were their supervisors. Applying the guard slowed down some cleaning processes. Higher management had a common interest with the first-line managers in closing their eyes to the defect. The alternative assumption, that the more senior managers knew nothing about it, would seem to have left them just as culpable. The fact that so many supervisors disregarded a hazard for such a protracted period could only indicate failure on the part of top management to provide safe supervision. They had infringed another part of Section 2 of the 1974 Act.

The interest of this case is not, however, the exclusive prosecution of first-line managers. This is not unique. Its importance is the significance it places upon their separate and distinct legal responsibility for maintaining a safe system of work in their own areas of operation. This responsibility applies whether or not anyone under their immediate control is actually injured. The supervisors were charged with not taking reasonable care for the safety of themselves and other people under Section 7a of the 1974 Act. Supervisors are normally charged under this section when they fail in their management duties. But the specific action or, in this case, failure to take action on which the law enforcement officer based his case, was to report a defective guard. He gave testimony to two immediate causes of the accident: an unsafe practice by one of the foremen, and a badly maintained machine. But the more important underlying cause was the supervisors' failure to monitor, report, and ensure that the faulty guard was repaired. The root of the trouble was the readiness of the supervisors to allow a system of work that was unsafe by virtue of their own omissions, to be kept operating over a period of months.

The growing awareness of the wide range of responsibilities encompassed in the term *"safe system of work"* is evident elsewhere in the legal system. A large proportion of claims for compensation for injury at work in civil law are based upon the argument that a safe system of work has not been maintained. This may enable a claimant to make out an effective case against an employer if any one aspect of the whole interlocking system of management planning, organisation and control can be shown to be defective.

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What is a Safe System of Work?

The purpose of this paper is to attempt to analyse what is involved in a safe system of work. It will then assess what is the role of the supervisors in the system, and how best they can prepare themselves for it.

The first problem is that there is no legal definition of a safe system of work. The meaning of the phrase, though used in the 1974 Act, was not explained. The provision and maintenance of "safe systems of work" was merely one item in the catalogue of duties imposed upon employers in Section 2. The other duties included the provision and maintenance of plants which were safe and did not involve risks to health; similar arrangements for the use, handling, storage and transport of materials; the place of work, including the means of coming and going to it; the working environment; and the information, instruction, training and supervision provided for employees. No attempt was made in the text of the Act to indicate any order of relationship between the respective items in this list.

The use of the term "system of work" in civil law judgements reflects a similarly limited interpretation. Lord Wright in a widely quoted dictum in 1938 (Wilson v. Clyde Coal Ltd) asserted that the employer's Common Law duty of care towards his employees involved a threefold obligation. One was to provide a competent workforce. A second was safe materials, and the third, a proper system and effective supervision. Later judgements indicated a more numerous classification. The employer's duty of care is exercised through a safe workplace, safe plant and appliances, reliable protective equipment, responsible behaviour of fellow employees, and finally a safe system of work.[2] This "laundry list" view of the employer's duty of care is similar to the analysis of the employer's duties in Section 2 of the 1974 Act. The close identity was intentional. Section 2 of the 1974 Act was merely a transfer of the employers' Common Law duty of care into a Statute.

The Health & Safety Executive (HSE) in some of their policy pronouncements have indicated that they are cautiously moving away from the traditional view of safety management. In 1981 they conceded — without totally endorsing it themselves — that the view was gaining increasing acceptance that the protection of people, plant, premises, and the environment should all be regarded as part of a coherent whole.[3] In another analysis, two years later, the HSE seemed to have moved further.[4] They defined a safe system of work as a considered method of working to establish a formal framework. This framework should ensure that all the steps necessary for safe working were anticipated and implemented. The addition of the word "implemented" extends the definition from prescription to deed. This is much nearer to a unitary conception of work as a system.

Problem of Classification

There seems to be a fundamental weakness in a definition which regards a safe system of work as residing in the formal methods and procedures of work and not in all its other functional aspects. For in practice the one underpins all the others. Most of the other widely recognised categories of the sources of accidents — an unsafe workplace, dangerous materials, machinery failure or bad employee performance may themselves to a considerable degree be reduced to failure of method.

H.W. Heinrich pointed out sixty years ago that there was no rigid dichotomy between mechanical failures and unsafe acts of people. This was the significance of the second and third dominoes in his celebrated domino theory. Faults of man were the underlying cause of mechanical failures. Most mechanical malfunctioning, he demonstrated, must itself be attributed to mistakes by human agents at one stage or another — either in design, construction, maintenance or operation. It followed that unsafe equipment, tools and machinery were only special cases of unsafe methods of work.[5]

A similar train of argument links hazardous materials to faults of method. Throughout the nineteenth century and indeed over much of the first half of the twentieth these two sources of accident were regarded as separate and distinct. A whole range of lung diseases used to be regarded as unavoidable occupational hazards in, for example, coal mining, foundry work and potteries. They were considered to be quite outside the control of management. Today none of these would be tolerated as acceptable consequences of employment. They can almost all be either suppressed or effectively guarded against by human action.

Similarly, the distinction between unsafe places of work and failures in work method can no longer be easily sustained. It may still have some validity for employees like trawlermen, steeplejacks and divers. But increasingly, employers are expected — by better design and equipment, or by more rigorous safety discipline — to remove or to avoid what were previously regarded as natural hazards. Much the same argument can be applied to unsafe employee behaviour. This too can be blamed upon unsafe methods on the part of the employers, either in selection, training, motivation, instruction or supervision of their workforce. Clearly some personal breakdowns are unpredictable. But as a general rule human behaviour at work is controllable.

If this is accepted, the recognised categories of sources of accidents — unsafe workplaces; dangerous materials; machine malfunctions; and, not least, unsafe behaviour of employees, can, in very large measure, be ascribed to failures in the method of work.

So the definition of a safe system of work as a safe method of work is in effect to ascribe to it a meaning which encompasses every other functional element in the work process. It represents the entity of a relationship of interacting parts. This meaning is familiar enough to systems analysts. It has been used as the model for accident prevention, particularly in the United States in the aerospace and electronics field.[6] More recently, its influence is apparent in "loss control" and "risk management" approaches to occupational safety.

Practical Advantage of a Unitary View

This way of looking at a safe system of work should be a help in allocating safety responsibilities. It encourages the view that the function of safety management is indivisible. Its boundaries are at least as wide as the organisation's own. There are no "no-go" areas within it. All managers — and particularly those in direct contact with men and women operating the plant — have safety responsibilities. This point was made in the Robens Committee Report in 1972.[7] It has still to be fully absorbed in the practice of industrial management and, indeed, to be given a recognised backing in the national safety scheme. The simple legal requirement in the 1974 Act for supervision to be adequate in respect of safety has never been fleshed out in any Regulations or Code of Practice.

Looking at safety at work as a unitary system should not rule out an understanding of its boundaries. Like many other man-made systems — it is not a closed one. It operates in an environment from which outside elements may from time to time irrupt into it. External economic pressures, criminal action, natural disturbances, and aberrant human behaviour, for example, which are partly or wholly outside the control of management, may throw a safety system off course. Safety management cannot just look inwards. The most perfectly coherent internal safety practices can at any time be disrupted from outside. A safe system of work must involve careful monitoring of its own mechanics, and vigilance about the external environment. This is one of the virtues of the risk management approach to the problem. It develops a two-directional view.

New Legislation

Recent health and safety legislation in Britain seems to underline the need to give a wider meaning to a safe system of work . The 1984 Control of Industrial Major Hazards (CIMAH) Regulations are concerned with plants which are potential major hazards.[8] These Regulations have been prompted by the series of disasters, including Flixborough, Seveso and most recently Bhopal. In these, accidents have taken lives, in the Bhopal case in their thousands, and involved the public living in the vicinity as well as employees. They have compelled all the countries in the EEC, and a great many others, to take a radical new look at their occupational safety schemes.

Under these CIMAH Regulations, employers are required to demonstrate that the work process is safe through all its stages: in its design, and construction, in the method of inspection and maintenance,in its operation, in the provision for safe storage of materials, and, finally, in the arrangements for dealing with an emergency, should one occur. The safety requirements must not only apply to the material aspects of the process. The Regulations also extend to the information, training and equipment of the workforce.

Another impending set of Regulations (The Control of Substances Hazardous to Health, COSHH) is being issued in response to the growing awareness of the long-term threat to employees' health of the huge increase in quality and variety of chemicals used in industry.[9] These Regulations lay down extensive new requirements on employers. When they are eventually promulgated they will set out stage by stage, and factor by factor, requirements for a safe work system. The requirements will not be limited to the work process, in addition employers must regularly monitor and record their employees' health and the levels of toxic substances in the atmosphere.

These two sets of Regulations open up new dimensions to the employers' responsibilities to maintain safety at work. The responsibilities set out under the 1974 Act and in Common Law judgements relate to the functional elements in a work system — the plant, machinery, workplace, employees and work processes. CIMAH and COSHH between them necessitate at least two new angles of vision.

The first of these is the specification for a work process to be safe at every stage of its development. The new Regulations itemise the design, planning and construction phases as distinct from the operational phase of a production process. The process must be safe through all of these.

The second extension of the definition results from a closer scrutiny and analysis of the processes of control in a safe system of work. The COSHH Regulations in particular highlight the importance of monitoring the system in respect of environmental pollution and the health of people working in the plant. The management responsibility for this aspect of a safety system — which might be described as the cybernetic function — has received comparatively little attention from the 1974 Act. The Safety Representatives and Safety Committees Regulations of 1977 underline the importance of routine workplace safety inspections for safety representatives; but no comparable responsibilities are spelt out for management.[10]

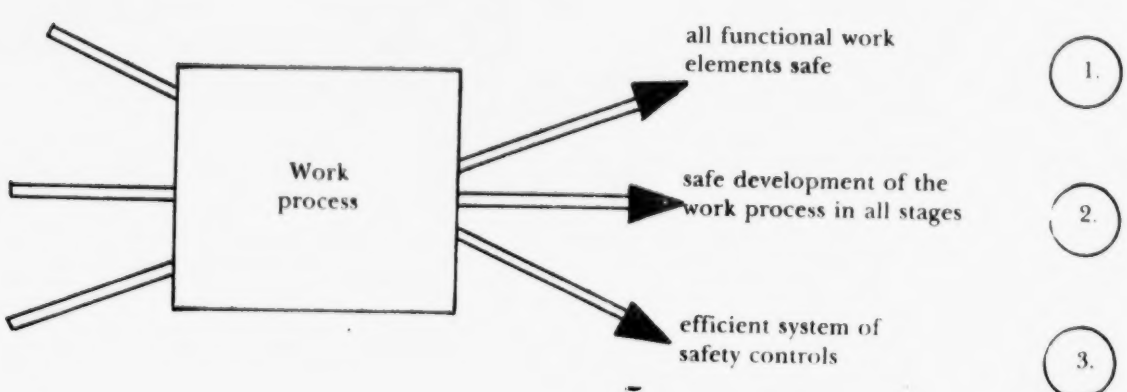
The new extra dimension of the safety system is further illustrated in the CIMAH Regulations. These outline management responsibility for coping with the consequences of a breakdown. The Regulations are largely concerned with this aspect of safety. What is management's role should an accident occur? This is an important addition to the list of the employers' legal responsibilities for safety.

The 1974 Act was almost exclusively concerned with the prevention of accidents. Outside the general requirement of a duty of care there was nothing in the main Act setting out what management's responsibilities were should the system ever break down. The whole area of emergency planning and organisation in the firm was left blank. Yet accidents involving fires, property damage and personal injuries are the lot of almost every workplace at some time or another.

Taking all the safety legislation together, a safe system of work may therefore be viewed from three distinct dimensions. These are obviously not an exhaustive list. One is the functional relationship of the elements of a work process — the people, the tools, machinery, materials, plant and work environment must all be safe.

The second is the development aspect. A work process must be safe from its design to its final operational stage. The third is its control procedures. These must be efficient in keeping a system of work on a safe course and, in the event of a breakdown, which may occur even with a safe system of monitoring, to get it back on course again with the minimum of loss and suffering.

In a diagram the system could be illustrated in this way:



Five Stages in a Safe System of Work

By drawing together these three dimensions of a safe work process, it is possible to provide a more rounded view of what a total safety system should consist of. This view takes in the three dimensions of how a safe work process should be managed. It has five distinguishable stages.

These are:

i) design and planning

ii) construction (including assembly of all the factors of production, including labour)

iii) work operation

iv) monitoring

v) dealing with an emergency

Taken together they represent an overall view of the safety responsibility of a firm; and, to a greater or lesser extent, each one of these makes demands on the attention and the professional competence of the supervisor.

Stages 1 and 2

Operational supervisors have some involvement in the first two of these stages. They may well have valuable experience of the problems which emerge in actually running a work process which should be taken into account during the design and planning stages. This may enable the designer to anticipate and remove hazards in advance. Similarly, in the specification of tools, machinery and the selection and training of employees, the supervisors' experience at the sharp end of the production process should be made use of. Their advice may help to remove potential hazards at source.

Stage 3

The remaining three stages are likely to affect production-line supervisors much more directly. The third stage involves the actual operational process when the goods are produced. At this stage supervisors must ensure that the whole process is conducted safely. This does not mean just safety at the workbench. This was the weak point in the traditional argument that safety should be taught as one of the elements in doing the job correctly. For accidents occur not only at the workbench. They can happen coming to and from it. Moreover, the sources of danger may be in the environment: in the atmosphere, or in the lighting system, for example; and indeed anywhere in the curtilage of the plant. A safe work process must in fact involve the whole workplace as well as the workbench; materials as well as tools and machinery; the people; personal equipment; and the working environment. Last, but not least, the hazard may spring not from deficiencies in the operators, or their materials, or their tools or machines, but from a faulty design of the work process, inadequate training or written instructions, or a management defective in quality or quantity at any level.

For supervisors to be in command of all these aspects of the working process and to ensure they are all conducted safely, they need to have mastered a dauntingly long and complex list of safety codes. Many of these will be issued by their firm as annexes to its written safety policy, and many will be requirements of the law. They need, too, the ability and qualities of character to encourage the individual men and women at the workbench to apply the safety codes diligently. This is a much more extensive and demanding remit than just getting an employee to operate a machine according to the book.

Stage 4

The supervisors' responsibilities in the monitoring stage are just as demanding. Any emerging hazards they observe, whether in their own areas of authority or elsewhere in the plant, must be reported. Doing this will not always be popular. Higher management may not want to incur the extra costs which rectifying the defect may involve them in. The workforce may not enjoy having established routines interfered with. This duty can become particularly onerous for a supervisor who is the only one who is fulfilling this role conscientiously. He or she may be marked down as an interfering busybody. Yet this is probably the most important single action management can take to keep a workplace safe. As H.W. Heinrich pointed out, conscientious reporting and action upon the first warning signs of defects could eliminate most accidents at work.[11]

Supervisors do not only need to use their own eyes, ears and, one should add, nose, to sense the first signs of trouble. They are unlikely to be the first to get the signal. The men and women actually on the machines will normally be closest to the source of trouble. They need to be enrolled in the monitoring process. The SRSC Regulations of 1977 provide for the employees to have a safety representative who can conduct periodic workplace inspections for safety.[12] These need to be supplemented by the vigilance of every employee — not, like the safety representative, doing the rounds once a quarter — but every second of every day in his or her own area of work.

Unhappily, the 1974 Act, unlike the Construction Regulations under the Factories Act, failed to include safety monitoring in the duties of employees. This vital ingredient in a safe system of work is, in consequence, frequently disregarded, even by conscientious employers.

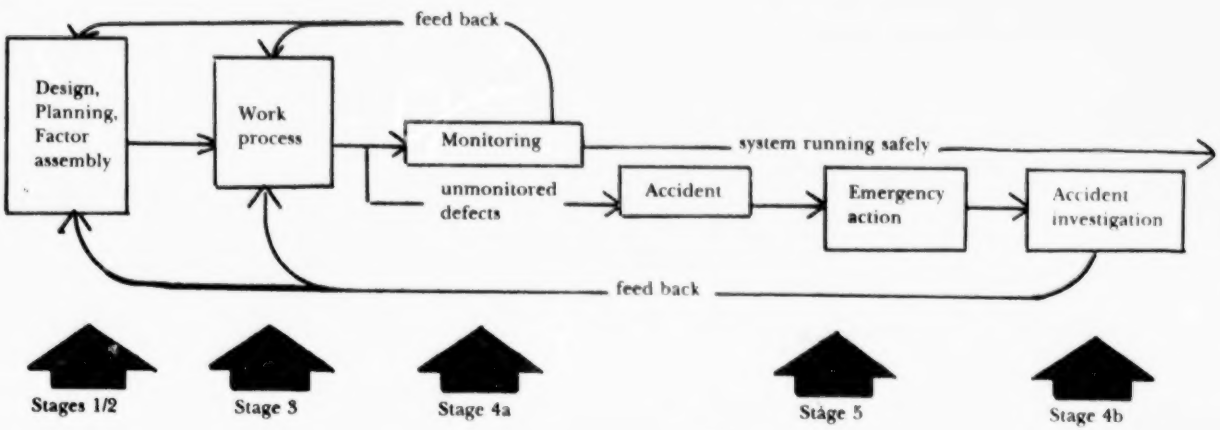
An exception may be seen in Cadburys Bournville factory. Here in addition to a vigorous routine inspection policy conducted by management safety advisers and union safety representatives, individual employees undertake a Safety Monitoring Programme. For half an hour each month the employees join with their supervisor to conduct a monitoring exercise on one aspect of workplace safety. The programme runs for fifteen months and during that period covers every source of likely hazard. The object of the programme is twofold. One is to refresh the employees' memories, so sharpening their awareness of the safety codes. The other is to encourage them to be vigilant in reporting defects and abnormalities, which, if left, could cause accidents.

Although safety training is laid down in Section 2 of the 1974 Act as one of the duties employers owe their employees, it is rarely enforced. Cadburys experiment in combining training and monitoring is worth watching closely. If it succeeds, it should show the way to closing two embarrassingly large gaps in the nation's occupational safety defences.

Stage 5

The final stage of a work process is to have ready emergency procedures to deal promptly and effectively with the consequences of a breakdown, should one occur. Once again the supervisors carry the immediate burden of responsibility in emergency situations. They are likely to be the only representatives of management on the spot. They must react first in circumstances where speed is often vital. Supervisors need to be able to handle fire and accident procedures with the calmness, directness and discipline the situation demands. They must alsobe able to call upon a similarly disciplined response from their work teams.

Some companies encourage all their supervisors to take a first aid course and becc me qualified. There may be occasions when no other trained help is available. In any case the training equips the supervisors to give the right advice and take the correct action on the immediate treatment of casualties. Supervisors who are proficient in using portable fire extinguishers and who know their limitations are also equipped to set the right example to the rest of their workforce in the event of a fire.



The Supervisor's Role Set Out as a System

The relationship between stages 4 and 5 in this analysis is, of course, over-simplified. The two stages are not separate and discrete. Monitoring, for example, does not only take place before a breakdown to prevent accidents occurring. It is no less essential after an accident has occurred. The breakdown needs to be investigated and analysed, and appropriate remedies have to be applied to prevent any recurrence. The two parts of the monitoring system are shown as 4a and 4b in the diagram on page 6. A safe system of work, with this modification, would proceed on something like the lines set out in the diagram.

Checking the Terms of the Contract

The sharper definition of the employer's legal responsibility for creating and maintaining a safe system of work focuses attention on the need for supervisors to define their own position in the hierarchy of management. How much of the responsibility rests on them?

This is partly dependent upon what the law affirms, and partly upon the supervisors' contract of employment. In their own interests it is important that supervisors find out about both of them: what is written on the lines, and what a presiding magistrate might decide to read between them.

The legal duties on the employer are spelt out in Section 2 of the 1974 Health and Safety at Work Act. This is the section that requires the employer to operate safe systems of work. It also requires him to ensure that his employees be properly informed, instructed and trained in the safety aspects of their work, and that he provides supervision which is also competent in these respects.

There are two sections of the 1974 Act which may divert some or all of these responsibilities from the employer to his supervisors. Section 36 may extend or wholly transfer legal responsibility from the employer to other people if they are judged to be at fault. These other persons may include supervisors.

But the section under which supervisors are most frequently prosecuted is Section 7a. This imposes duties on employees to take care of themselves and of any others affected by them. This section is applied to supervisors who do not carry out their duties to provide competent and effective supervision from the safety aspects. This was the section under which the four supervisors involved in the Avonmouth case were prosecuted.

The decision as to whether the supervisor or his senior manager, or indeed the employer, as such, should bear the legal responsibility for a breach of safety is likely to be determined by the explicit share of responsibilities allocated in the contracts of employment. It must be borne in mind that the company's written safety policy statement is therefore of critical significance as to where contractual responsibility is to be placed. The supervisor's contract will no doubt commit him to observe this policy. Another important source of the supervisors' responsibility is the written job specification which he may be given by the employer.

It should not, however, be presumed that the absence of a clear and specific reference to safety duties necessarily exonerates a supervisor in the event of a prosecution. The mere inclusion of the term supervisor or foreman in the description of the job in the contract could well be sufficient. After all, each of these terms on its own implies that the person concerned exercises authority, and the authority could well be assumed to cover safe working arrangements.

Supervisors should find out for themselves precisely what safety obligations are placed upon them under their contracts or, by extension, in the company safety policy, or in their personal job specifications. The most likely description of their duties is a general commitment to be responsible for maintaining safety within the appropriate section of the plant for which they have immediate responsibility. The more general the terms in which it is expressed, the more comprehensive is the responsibility placed upon them.

If this is the contractual situation — as it very frequently is — supervisors should not hesitate to remind top management that they need to be given the necessary resources to carry out their safety responsibilities — in respect of equipment, training, authority and management support.

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Legal Duties and Legal Rights

Supervisors who fall foul of the safety laws are normally prosecuted under Section 7, as employees, for failing to carry out their duty of care. They should remind themselves that they have rights as well as duties under the 1974 Act. They are entitled as employees to the necessary information, instruction and training from their employer. This has to be given to employees under Section 2 of the Act. In the case of supervisors, this information, instruction and training needs to be relevant to the role they have to fulfil as line managers, responsible for the safety of their own areas of authority.

The record of safety briefing and training for supervisors in British industry is patchy. Many supervisors seem to have to get by with little or no formal training at all. Yet they have a plain legal right to adequate briefing and training under the 1974 Act, even though it has never been spelt out in detail. Supervisors need not forgo this right merely because it has not been elaborated.

Supervisors have one other important protection under this Act. Under Section 2 their employers have a duty to provide safe supervision. They are likely to be culpable under this Section for any failings of their supervisors which do not result from deliberate malpractice. Legal responsibility for mistakes by supervisors resulting from lack of relevant information, inadequate instruction, lax management control or insufficient safety training ought, under Section 2, to redound on the employer. This was the case which ASTMS made on behalf of the Avonmouth supervisors. Only if wilful neglect or wrongdoing can be demonstrated against supervisors ought they to take legal responsibility for breaches of safety, but getting justice depends upon vigilance and a clear understanding of one's personal legal rights and duties

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